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**Subject:** FW: Time Critical Items for Portland Harbor RI and BRA  
**Date:** 06/09/2008 11:52 AM

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Karen,  
This morning you & I discussed the 6/5/08 EPA/LWG SW Loading mtg & the next steps. Here's Eric's summary & expectations for a number of unresolved RI/BRA issues. Eric wants "agreement on stormwater loading calculation methods" resolved by 6/30..., (see # 7 in Eric's e-mail below).  
Jim

-----Original Message-----

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Sent: Friday, June 06, 2008 9:54 AM  
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Subject: Time Critical Items for Portland Harbor RI and BRA

Below is a summary of unresolved issues for the Portland Harbor RI and BRA and the required time-frame for resolution in order to keep the overall project schedule on track. Note that for some issues, the deadline has passed. Consequently, we are in serious danger of significant project schedule slippage and will need to redouble our efforts to resolve these items. As everyone may recall, June 1, 2008 was established as a drop dead date. A quick look at the calendar will show that today is June 6th.

The LWG project team is ready to begin preparation of the draft RI and BRA reports. I understand that the data has been finalized and is undergoing a final review by LWG members prior to submittal to EPA. We have pushed back the things we could until June 30th. However, there is no more slack in the schedule.

Outstanding Time Critical Issues for Portland Harbor RI:

1) Inclusion of RI data from RMI-2 and Multnomah Channel in the "Site" for the purposes of the baseline risk assessments (June 2).

EPA does not agree to the exclusion of data collected between RM 1 and 2 and within Multnomah Channel from the baseline risk assessment. The risk assessment is merely a tool to aid in the evaluation of site data and, as a result, it is inappropriate for this data to be evaluated separately. However, EPA agrees that it is appropriate to discuss and interpret this information in the context of the conceptual site model and with respect to the nature and extent of contamination discussion. This decision has been communicated verbally to the LWG. Some further discussion on the presentation of this information may be required but the issue is generally resolved.

2) EPA comments on the Food Web Model and Biota-Sediment Accumulation Factor development appendices of the Comprehensive Round 2 Report (June 2, approaches must be resolved by June 30)

EPA has received draft comments from Larry Burkhard. Comments received to date are general in nature. I will begin formulating comments on this section of the report today. My goal is to submit comments by June 12, 2008. Any comments you have must be submitted to me by Wednesday, June 11th at the latest. This is a time critical.

3) Tissue TRV Methodology (June 6).

The TRV methodology has been under discussion for some time. A final draft was sent out to the eco team yesterday. Comments are due by COB Monday. We will send the TRV methodology to the LWG next week. This is time critical.

4) Selection of Tissue TRVs (June 13)

Although we will submit the TRV methodology to the LWG next week, the process for establishing Tissue TRVs is unclear. It will likely take some time to finalize and select TRVs. TRVs are needed to begin the baseline ecological risk assessment. This is time critical.

5) Interpretation criteria for benthic toxicity bioassays (June 2)

We have been discussing how to evaluate benthic toxicity results for some time. The original issue was whether to rely on the status and trends approach set forth in EPA's problem formulation for the baseline ecological risk assessment or the RESET approach. A compromise approach was developed by the LWG. The eco team did not agree to this proposal. I do not believe that further discussion on this topic will be productive. As a result, I am prepared to make a decision on this topic in the very near term. This is time critical.

6) Analyte Lists for use in RI Report and modeling efforts (June 30)

I distributed list of chemicals to the project team on Wednesday. I would like comments on this by the end of next week. With the exception of the CSM chemicals, we are not too far apart from what was proposed by the LWG. This is moving forward and should be resolved by June 30th.

7) Agreement on stormwater loading calculation methods (June 30)

A meeting was held yesterday to discuss this topic. A plan is in place to develop, discuss and resolve comments. This should be resolved by June 30th.

8) Organic carbon normalization for background calculations:

The LWG has proposed organic carbon normalization for background. Although I believe that organic carbon content and grain size data are relevant in the evaluation of site data with respect to background, I do not support a blanket normalization of the data. This decision has been communicated verbally to the LWG. Some further discussion on the presentation of this information may be required but the issue is generally resolved.

This is a serious situation. I am prepared to make all decisions as necessary to keep this project on track. I will expect everyone's continued support and cooperation in this matter.

Thanks, Eric